

Fill in this information to identify the case:

Debtor 1 Katherine Tzumakaris

Debtor 2 Konstantinos Tzumakaris
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 18-11031 AMC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Towd Point Mortgage Trust 2020-4, U.S. Bank
National Association, as Indenture Trustee

Court claim no. (if known): 7-1

Last 4 digits of any number you use to identify the debtor's account: 5657

Property address:

2500 Park Lane
Broomall, PA 19008

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 03 / 01 / 2023

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____

c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Katherine Tzumakaris and Konstantinos Tzumakaris
First Name Middle Name Last Name

Case Number (if known): 18-11031 AMC

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Michael Farrington

Date 04/07/2023

Michael Farrington
07 Apr 2023, 17:33:48, EDT

KML Law Group, P.C.
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Philadelphia, PA 16106
215-627-1322
bkrgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Katherine Tzumakaris
Konstantinos Tzumakaris
Debtor(s)**

BK NO. 18-11031 AMC

Chapter 13

**Towd Point Mortgage Trust 2020-4, U.S.
Bank National Association, as Indenture
Trustee**

Related to Claim No. 7

Movant

vs.

**Katherine Tzumakaris
Konstantinos Tzumakaris**

Debtor(s)

Scott F. Waterman,

Trustee

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE**

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on April 10, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)
Katherine Tzumakaris
2500 Parke Lane
Broomall, PA 19008

Attorney for Debtor(s) – (via ECF)
Eugene J. Malady, Esq.
Eugene J. Malady, LLC
P.O. Box 565
Media, PA 19063

Konstantinos Tzumakaris
2500 Parke Lane
Broomall, PA 19008

Trustee – (via ECF)
Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

Method of Service: electronic means or first-class mail

Dated: April 10, 2023

/s/ Michael P. Farrington
Michael P. Farrington Esq.
Attorney I.D. 329636
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BNY Mellon Independence Center
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